

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Eugene Flemons

Case: 2:24-mj-30398  
Assigned To : Unassigned  
Assign. Date : 9/13/2024  
Case No. Description: RE: SEALED MATTER  
(EOB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 28, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21.U.S.C. § 841(a)(1)	Distribution of controlled substances.
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm.
18 U.S.C. § 924 (c)	Possession of a firearm in furtherance of a drug trafficking crime.

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

Steve Allick, Special Agent (ATF)

Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: September 13, 2024

City and state: Detroit, Michigan



Judge's signature

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Steven Allick, Special Agent for the Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been since May of 2014. I am currently assigned to the Detroit Field Division. I completed 26 weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances.

2. During my employment with ATF, I have participated in numerous investigations of criminal violations relating to firearms, violent crime, and narcotics. I have participated in various aspects of criminal investigations, including interviews, physical surveillance, and obtaining and executing search warrants.

3. This affidavit is made in support of a criminal complaint and arrest warrant for Eugene Flemons for violating 21 U.S.C § 841(a)(1),

distribution of controlled substances; 18 U.S.C. § 924 (c), possession of a firearm in furtherance of a drug trafficking crime; and 18 U.S.C. § 922(g)(1), felon in possession of a firearm.

4. The facts in this affidavit come from my personal observations, training, experience, review of relevant police reports and information obtained from ATF Special Agents, Task Force Officers, Police Officers, Detectives and witnesses. This affidavit is intended to show that there is sufficient probable cause and does not set forth all information known to law enforcement regarding this investigation.

### **SUMMARY OF THE INVESTIGATION**

5. On August 28, 2024, law enforcement executed a search warrant on a residence on Palmetto Avenue in Detroit, Michigan. Flemons opened the front door for the police and was the only person in the house. His personal items were found throughout the home, including a utility bill addressed to him at that address, and his identification inside his clothing in the bedroom. Flemons has also registered a car at that address in his name.

6. During the execution of the search warrant, law enforcement found a total of approximately 162 grams of suspected crack cocaine, approximately 42 grams of which was packaged into 72 smaller plastic

bags ready for sale in the living room. Law enforcement also recovered three grams of suspected fentanyl, divided into 12 lottery tickets for sale, also in the living room.

7. In addition, officers found 48 pills labeled at suboxone and 43 labeled as hydrocodone.

8. Officers also found a little over \$15,000 in United States Currency in Flemons's bedroom, ten firearms, ammunition, and firearms parts and accessories throughout the house.

9. As to the guns, in Flemons's living room officers found three guns, including a:

- a. Draco, 7.62 caliber pistol, behind the couch;
- b. Ruger, 5.7 caliber pistol, under the couch; and
- c. A Springfield Armory, 9mm pistol, behind a pillow on the couch.

10. In the southwest bedroom, officers found seven more guns, including a:

- a. American Tactical, 12-gauge shotgun, on the bed;
- b. Smith & Wesson, AR-style rifle, leaning on the wall in corner;
- c. Sarsilmaz, 9mm pistol, on the bed, under a pillow;
- d. Glock, .357 caliber pistol, on the bed under a pillow;

e. Smith & Wesson revolver, .32 caliber, on the bed under a pillow;

f. Taurus, 9mm pistol, along baseboard of the bed; and a

g. Glock, .22 caliber pistol, under a dresser in a case.

11. An ATF Interstate Nexus Expert determined, based on a verbal description of the firearms, that the firearms found in Flemons's house were likely not manufactured in the State of Michigan, meaning that the firearms traveled in interstate or foreign commerce.

12. In September 2024, I performed a computerized criminal history search on Flemons using the Michigan Law Enforcement Information Network. I learned Flemons had at least the following felony convictions:

a. In 2001, he was convicted of carrying concealed weapon in Wayne County, Michigan;

b. Also in 2001, he was convicted of delivering or manufacturing a controlled substance, less than 50 grams in Wayne County, Michigan;

c. In 2004, he was convicted of felony firearms in Wayne County, Michigan;

d. And in 2008, he was convicted of delivering or manufacturing a controlled substance, less than 50 grams in Macomb County, Michigan.

13. Reviewing Flemons's criminal history, I noted he has served over a year in prison on several different instances, and therefore would be aware of his status as a convicted felon thus prohibited from possessing firearms.

## CONCLUSION

14. Probable cause exists that Eugene Flemons possessed a controlled substance with the intent to distribute in violation of 21 U.S.C § 841(a)(1); that he possessed a firearm in furtherance of that drug trafficking crime in violation of 18 U.S.C. § 924(c); and that he was a convicted felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



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Steven Allick, Special Agent,  
Alcohol, Tobacco, Firearms

Sworn to before me and signed in my presence and/or by reliable electronic means.



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Honorable David R. Grand  
United States Magistrate Judge

Date: September 13, 2024